

Mark Passin

From: Zach Press <zach.press@klarislaw.com>
Sent: Thursday, August 11, 2022 11:47 AM
To: CeCe Cole; Mark Passin; Nancy Wolff; Lance Koonce
Subject: RE: Freeman v. Wolff

Hi Mark,

On behalf of Defendants Prospect Agency LLC and Emily Sylvan Kim, we do not oppose your request for a one-week extension of time.

Best,
Zach

Zach Press (he/him)
Associate | +1 718-974-8717

KLARIS

From: CeCe Cole <CCole@cdas.com>
Sent: Thursday, August 11, 2022 14:45
To: Mark Passin <mark@csrlawyers.com>; Nancy Wolff <NWolff@cdas.com>; Lance Koonce <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>
Subject: RE: Freeman v. Wolff

Mark,

Defendants Tracy Deebbs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a Macmillan, and Universal City Studios LLC ("Defendants") do not oppose your request and that Plaintiff's responses to Defendants' discovery demands are now due August 22, 2022.

Best,
CeCe

From: Mark Passin <mark@csrlawyers.com>
Sent: Thursday, August 11, 2022 11:40 AM
To: Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>; Lance Koonce (<lance.koonce@klarislaw.com>) <lance.koonce@klarislaw.com>; Zach Press <zach.press@klarislaw.com>
Subject: Re: Freeman v. Wolff

Please get back to me by 1:00 pm (edt) because I intend to make a motion for more time today. Thanks.

Mark Passin
Of Counsel



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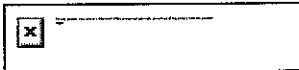
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On Aug 10, 2022, at 10:24 PM, Mark Passin <mark@csrlawyers.com> wrote:

All,

Plaintiffs' response to all of your outstanding discovery is due on Monday. Can we please have a one week extension of our time to respond to the outstanding discovery?

Mark D. Passin
Of Counsel



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